

**UNITED STATES BANKRUPTCY COURT**

**FOR THE**

**EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

In the Matter of:

LANCE F. WELCH

AND

HELENA M. WELCH

Debtors

Chapter 13

Case No. 25-10601-KHK

**AMENDED OBJECTION TO CONFIRMATION OF PLAN**

Thomas P. Gorman, Trustee, supplements and amends his previously filed Objection to Confirmation (Dkt. #16) to add as additional feasibility grounds the fact that the Plan (Section 4D) and Schedule D (Section 2.3) treats the secured claim(s) of The Huntington National Bank as a single debt, when that creditor appears to have two separate and distinct secured claims (Proofs of Claim Numbers 8 and 9).

Date: May 14, 2025

/s/ Thomas P. Gorman  
Thomas P. Gorman  
Chapter 13 Trustee  
1414 Prince Street, Suite 202  
Alexandria, VA 22314  
(703) 836-2226  
VSB 26421

**Trustee's Amended Objection to Confirmation of Plan**

Lance F. Welch and Helena M. Welch, Case # 25-10601-KHK

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 14<sup>th</sup> day of May, 2025, served via ECF to authorized users or mailed a true copy of the foregoing Amended Objection to Confirmation of Plan to the following parties.

Lance F. Welch  
Helena M. Welch  
Chapter 13 Debtors  
21259 Dubois Ct  
Ashburn, VA 20147

Jeffery T. Martin, Jr.  
Attorney for Debtor  
Martin Law Group, P.C  
8065 Leesburg Pike, Ste 750  
Vienna, VA 22182

      /s/ Thomas P. Gorman        
Thomas P. Gorman